

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KAI S. WELLS,

Plaintiff,

vs.

Civil Action No.:  
1:20-CV-10332-JPO-KHP

COMMISSIONER OF SOCIAL SECURITY,

Defendant.  
-----X

**PLAINTIFF'S UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME TO FILE  
PLAINTIFF'S MOTION FOR JUDGMENT ON THE PLEADINGS**

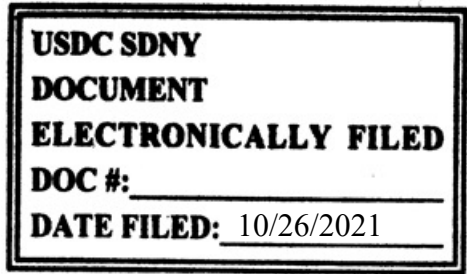
PLEASE TAKE NOTICE that upon all the prior proceedings heretofore filed, Plaintiff moves this Court, on submission, for an Order granting an enlargement of time of thirty (30) days to file Plaintiff's motion for judgment on the pleadings and memorandum of law in support in this matter, which is currently due on November 8, 2021. This is Plaintiff's first request for an extension and is necessary due to an unexpected increase in counsel's case load and briefs due in a short period of time from cases that were previously delayed from timely processing during the beginning of the COVID-19 pandemic.

Plaintiff has contacted counsel for Defendant who kindly consents to this motion.

Dated: October 25, 2021

Respectfully submitted,

By: /s/ Charles E. Binder  
Law Office of Charles E. Binder  
and Harry J. Binder, LLP  
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New York, NY 10022  
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**ORDER**

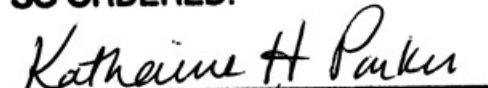
AND, NOW, this \_\_\_\_ day of \_\_\_\_\_, 2021, upon consideration of  
Plaintiff's Motion for an extension of time to file his motion for judgment on the pleadings,

IT IS HEREBY ORDERED that Plaintiff's Motion is GRANTED. Plaintiff's motion is  
due December 8, 2021. All subsequent deadlines are also extended by thirty (30) days.

Entered: \_\_\_\_\_

With respect to Plaintiff's letter motion for an extension of time, the Court hereby schedules a brief telephone conference for Tuesday, November 2nd at 11:15 a.m. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code: 4858267.

**SO ORDERED:**

  
**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE**

10/26/2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of October, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECMF system which will send notification of such filing to all registered CM/ECMF case participants.

/s/ Charles E. Binder  
Attorney for Plaintiff